



Thomas J. Cafferty
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December 22, 2021

Via Electronic Filing

Honorable Lois H. Goodman
U.S. District Court for the District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

Re: New Jersey Second Amendment Society, et al. v. New Jersey Press Association, et al.
Docket No.: 3:20-CV-05228-MAS-LHG
Our File No.: 110040.103304

Dear Judge Goodman:

This law firm represents Defendants, New Jersey Press Association and Peggy Stephan Arbitell (“NJPA Defendants”) in the above-referenced matter. Please accept this letter in lieu of a more formal application, on behalf of the NJPA Defendants, seeking an extension of time within which to answer or otherwise respond to the Second Amended Complaint for a period of forty-five (45) days, up to and including February 25, 2022. The requested extension of time is based upon the logistical challenges and difficulties presented by the recent uptick in Covid-19 cases, both nationwide and in this State, and the decision, made as a result of that uptick in cases, by Gibbons, P.C., the law firm representing the NJPA Defendants, to operate on a remote basis until at least the end of this year and possibly into next year as well.

The NJPA Defendants received a copy of the Second Amended Complaint on December 14, 2021. The NJPA Defendants previously sought, and were granted, a fourteen-day clerk’s extension of time to answer or otherwise respond to the Second Amended Complaint pursuant to Local Civil Rule 6.1(b). *See* ECF No. 68. Their response to the Second Amended Complaint is currently due on or before January 11, 2022. On December 20, 2021, defense counsel sought, via e-mail to Plaintiffs’ counsel, Plaintiffs’ consent to the extension of time requested herein. Plaintiffs’ counsel has not responded to the request for consent.

The NJPA Defendants respectfully request that, if acceptable, Your Honor sign and enter the enclosed Order, extending the time to answer or otherwise respond to the Second Amended Complaint for a period of forty-five (45) days, up to and including February 25, 2022. I thank the Court

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for its consideration of this request and remain available at the Court's convenience to address any questions or concerns.

Respectfully submitted,

s/Thomas J. Cafferty
THOMAS J. CAFFERTY

TJC/mlk
Enclosure